



1 documents, and for effective preparation of counsel. For these reasons and as further stated on the  
2 record at the status conference, the parties stipulate and agree that excluding time until June 12, 2019  
3 will allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(ii), (B)(iv). The  
4 parties further stipulate and agree that the ends of justice served by excluding the time from February 27,  
5 2019, through and including June 12, 2019, from computation under the Speedy Trial Act outweigh the  
6 best interests of the public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(ii),  
7 (B)(iv).

8 The undersigned Assistant United States Attorney certifies that he has obtained approval from  
9 counsel for the defendant to file this stipulation and proposed order.

10 IT IS SO STIPULATED.

11  
12 DATED: April 25, 2019

\_\_\_\_\_  
/s/  
SCOTT D. JOINER  
Assistant United States Attorney

13  
14  
15 DATED: April 25, 2019

\_\_\_\_\_  
/s/  
MARTIN SABELLI  
Counsel for Defendant Roberto Mancini

~~PROPOSED~~ ORDER

Based upon the facts set forth in the stipulation of the parties and the representations made to the Court on February 27, 2019, and for good cause shown, the Court finds that failing to exclude the time from February 27, 2019, through June 12, 2019, would unreasonably deny defense counsel and the defendant the reasonable time necessary for effective preparation, taking into account the exercise of due diligence, and is also appropriate in light of the complexity of the case, which the government represented involves thousands victims and tens of thousands of pages of documents. 18 U.S.C. § 3161(h)(7)(B)(ii), (iv). The Court further finds that the ends of justice served by excluding the time from February 27, 2019, through and including June 12, 2019 from computation under the Speedy Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and with the consent of the parties, IT IS HEREBY ORDERED that the time from February 27, 2019, through and including June 12, 2019 shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. § 3161(h)(7)(A), (B)(ii), (B)(iv).

IT IS SO ORDERED.

DATED: April 25, 2019



HON. EDWARD M. CHEN  
United States District Judge